EPA Question	Response	Records/Information Available
Section 1.0 - Respondent Information		
1. Provide the full legal, registered name and mailing address of Respondent.	Portland General Electric Company 121 SW Salmon Street Portland, OR 97204	
2. For each person answering these questions on behalf of Respondent, provide:		
Site Operator: Portland General Electric		
a. full name;	Arya Behbehani	
b. title;	Manager, Environmental Services	
c. business address; and	121 SW Salmon Street m/s 3WTCBR05 Portland, OR 97204	
d. business telephone number, electronic mail address, and FAX machine number.	Business Telephone Number: 503-464-8141 Electronic Mail Address: Arya.Behbehani@pgn.com Fax Number: 503-464-8527	
Site Consultant: URS Corporation		
a. full name;	David Weatherby, RG; Anne Gire	
b. title;	Senior Project Manager; Environmental Scientist	
c. business address: and	111 SW Columbia, Suite 1500 Portland, OR 97225-5850	
d. business telephone number, electronic mail address, and FAX machine number.	Business Telephone Number: 503-222-7200 Electronic Mail Addresses: David.Weatherby@urs.com; Anne.Gire@urs.com Fax Number: 503-222-4292	
3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, please indicate here by providing that individual's name, address, telephone number, fax number, and, if available, electronic mail address.	Arya Behbehani Portland General Electric Manager, Environmental Services 121 SW Salmon Street - 3WTCBR05 Portland, OR 97204 Telephone Number: 503-464-8141 Fax Number: 503-464-8527 Electronic Mail Address: Arya.Behbehani@pgn.com	

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Section 2.0 - Owner/Operator Information		
i. stormwater drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;	To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the substation's stormwater drainage: • Precipitation falling on Willbridge Substation infiltrates into the gravel surface or, during heavier rain events, flows overland to a ditch along the southwest margin of NW St. Helens Road. Run-off from the adjacent hill slope flows onto the substation and commingles with substation stormwater prior to discharging to the ditch. Stormwater from NW St. Helens Road also discharges to the ditch. The ditch drains to a catch basin that conveys water under NW St. Helens Road to a ditch on the northeast side of NW St. Helens Road. This ditch drains to North Doane Lake, which in turn drains to the River at City of Portland Outfall 22C (Willbridge Stormwater Drainage Assessment_12-6-11.doc). • A 1985 drainage plan of the substation shows subsurface tile drains under the substation that discharge to the roadside ditch, which in turn is depicted to continue northwest to a culvert under St. Helens Road. The presence of tile drains could not be confirmed during a November 2011 site visit. Specifically, no tile drain outfalls to the ditch were observed, and the ditch now discharges to the catch basin described above and not a culvert under St. Helens Road. See (Willbridge Stormwater Drainage Assessment_12-6-11.doc). Also see the response to Question 18 and the document (SPCC Facility Diagram.pdf) attached in response to Question 19.	See Attachments Willbridge Stormwater Drainage Assessment_12-6-11.doc Also see Question 19 Attachment SPCC Facility Diagram.pdf
k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the Property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;	To the best of PGE's knowledge, after reasonable inquiry, the only major modifications at the Willbridge Substation since PGE acquired the substation in 1973 was the replacement of cement equipment footings on October 1, 2001. See SPCC Facility Diagram.pdf) attached in response to Question 19.	Also see Question 19 Attachment SPCC Facility Diagram.pdf
15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information,	Also see the spill report (Q62_092111_Willbridge.pdf) attached in response to Question 62.	Also see Question 62 Attachment Q62_092111_Willbridge.pdf

EPA Question	Response	Records/Information Available
including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.		
18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:		
a. the location and nature of each sewer line, drain, ditch, or tributary;	To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the substation's stormwater drainage: • Precipitation falling on Willbridge Substation infiltrates into the gravel surface or, during heavier rain events, flows overland to a ditch along the southwest margin of NW St. Helens Road. Run-off from the adjacent hill slope flows onto the substation and commingles with substation stormwater prior to discharging to the ditch. Stormwater from NW St. Helens Road also discharges to the ditch. The ditch drains to a catch basin that conveys water under NW St. Helens Road to a ditch on the northeast side of NW St. Helens Road. This ditch drains to North Doane Lake, which in turn drains to the River at City of Portland Outfall 22C (see Willbridge Stormwater Drainage Assessment_12-6-11.doc). • A 1985 drainage plan of the substation shows subsurface tile drains under the substation that discharge to the roadside ditch, which in turn is depicted to continue northwest to a culvert under St. Helens Road. The presence of tile drains could not be confirmed during a November 2011 site visit. Specifically, no tile drain outfalls to the ditch were observed, and the ditch now discharges to the catch basin described above and not a culvert under St. Helens Road. See (Willbridge Stormwater Drainage Assessment_12-6-11.doc) Also see the response to Question 18 and the document (SPCC Facility Diagram.pdf) attached in response to Question 19.	See Attachments Willbridge Stormwater Drainage Assessment_12-6-11.doc Also see Question 19 Attachment SPCC Facility Diagram.pdf
19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these	The SPCC plan includes an evaluation of site stormwater drainage and the response procedures (e.g., berming) to be implemented to prevent spilled/released oil from discharging offsite (SPCC Facility Diagram.pdf).	Question 19 Attachments SPCC Facility Diagram.pdf

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Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention, Maintenance Plans or Spill Plans developed for different operations during the Respondent's operation of each Property.		
41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to: a. the nature and chemical composition of each type of waste; b. the dates on which those wastes were disposed; c. the approximate quantity of those wastes disposed by month and year; d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre-treatment plant, Publicly Owned Treatment Works (POTW), etc.); and e. whether and what pretreatment was provided.	To the best of PGE's knowledge, after reasonable inquiry, no drains are/were present at the Willbridge Substation. There are no treatment/pretreatment facilities at the Willbridge Substation.	
47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.	On September 21, 2011, approximately 1 gallon of transformer oil spilled onto gravel and concrete at the substation. The transformer label indicated that the oil had a PCB concentration of <1 mg/L and laboratory analysis of the oil reported nondetect PCBs (at a detection limit of less than 1 mg/L). The spill was reported to the PGE System Control Center, contained, and cleaned up (including surface washing and the removal and disposal of approximately 8 cubic feet of soil and gravel). See spill report Q62_092111_Willbridge.pdf.	Also see Question 62 Attachment Q62_092111_Willbridge.pdf

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Section 6.0 - Releases and Remediation		
62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify and provide copies of any documents regarding:	On September 21, 2011, approximately 1 gallon of transformer oil spilled onto gravel and concrete at the substation. The transformer label indicated that the oil had a PCB concentration of <1 mg/L and laboratory analysis of the oil reported nondetect PCBs (at a detection limit of less than 1 mg/L). The spill was reported to the PGE System Control Center, contained, and cleaned up (including surface washing and the removal and disposal of approximately 8 cubic feet of soil and gravel). See spill report Q62_092111_Willbridge.pdf.	Question 62 Attachment Q62_092111_Willbridge.pdf
a. when such releases occurred;		
b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks. drums, barrels, or recovery units). and treated);		
c. the amount of each hazardous substances, pollutants, or contaminants so released;		
d. where such releases occurred;		
e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;		
f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken;		
g. all persons with information relating to these releases; and		
h. list all local, state, or federal departments or agencies notified of the		

EPA Question	Response	Records/Information Available
release, if applicable;		
63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:	To the best of PGE's knowledge, after reasonable inquiry, PGE has no knowledge of waste disposal or of any spills, leaks, releases, or discharges of waste into drainage ditches at the Willbridge Substation.	
a. where the disposal system or floor drains were located;		
b. when the disposal system or floor drains were installed;		
c. whether the disposal system or floor drains were connected to pipes;		
d. where such pipes were located and emptied;		
e. when such pipes were installed;		
f. how and when such pipes were replaced. or repaired; and		
g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.		
64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:		
a. amount of soil excavated;	On September 21, 2011, approximately 1 gallon of transformer oil spilled onto gravel and concrete at the substation was reported to the PGE System Control Center, contained, and	See Question 62 Attachment Q62_092111_Willbridge.pdf

EPA Question	Response	Records/Information Available
	cleaned up (including surface washing and the removal and disposal of approximately 8 cubic feet of soil and gravel). See spill report Q62_092111_Willbridge.pdf.	
b. location of excavation presented on a map or aerial photograph;	To the best of PGE's knowledge, after reasonable inquiry, there are no maps, photographs, or figures that depict the location of the soil and gravel removed in response to the transformer oil release on September 21, 2011.	
c. manner and place of disposal and/or storage of excavated soil;	To the best of PGE's knowledge, after reasonable inquiry, PGE was unable to locate disposal documentation for the soil and gravel removal on September 21, 2011.	
g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;	PCB labeling on the transformer indicated PCB levels <1 ppm. Laboratory results indicated that the oil contained PCBs at a concentration of <1 ppm. See the spill report (Q62_092111_Willbridge.pdf) attached in response to Question 62 for additional details.	See Question 62 Attachment Q62_092111_Willbridge.pdf
h. all analyses or tests and results of analyses of the soil that was removed from the Property;	To the best of PGE's knowledge, after reasonable inquiry, PGE was unable to locate records of the analysis of soil and gravel removed as a result of the spill on September 21, 2011; however, the spill report (Q62_092111_Willbridge.pdf) attached in response to Question 62 indicates a PCB level of <1 ppm.	See Question 62 Attachment Q62_092111_Willbridge.pdf
68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s) or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.	On September 21, 2011, approximately 1 gallon of transformer oil (PCBs content <1 ppm) spilled onto gravel and concrete; see the spill document (Q62_092111_Willbridge.pdf) attached in response to Question 62. Laboratory results indicated that the soil and gravel contained PCBs at a concentration of <1 ppm. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of approximately 8 cubic feet of gravel and soil).	See Question 62 Attachment Q62_092111_Willbridge.pdf
69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release. Provide all documentation regarding, but not limited	On September 21, 2011, approximately 1 gallon of transformer oil (PCBs content <1 ppm) spilled onto gravel and concrete; see the spill document (Q62_092111_Willbridge.pdf) attached in response to Question 62. Laboratory results indicated that the soil and gravel contained PCBs at a concentration of <1 ppm. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of approximately 8 cubic feet of gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, PGE was unable to locate disposal documentation for the soil and gravel removal on September 21, 2011.	Also see Question 62 Attachment Q62_092111_Willbridge.pdf

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to, the following releases:		
71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property, Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.	On September 21, 2011, in response to a release of transformer oil, approximately eight cubic feet of soil and gravel were excavated. See the document (Q62_092111_Willbridge.pdf) attached in response to Question 62.	Also see Question 62 Attachment Q62_092111_Willbridge.pdf
72. Describe any remediation or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.	To the best of PGE's knowledge, after reasonable inquiry, the following presents a summary of known remedial activities at the site: On September 21, 2011, in response to a release of transformer oil, approximately eight cubic feet of gravel and soil were removed from Willbridge Substation. See the document (Q62_092111_Willbridge.pdf) attached in response to Question 62. PCB labeling on the transformer indicated PCB levels <1 ppm. Laboratory results indicated that the oil contained PCBs at a concentration of <1 ppm. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of approximately 8 cubic feet of gravel and soil). To the best of PGE's knowledge, after reasonable inquiry, PGE was unable to locate disposal documentation for the soil and gravel removal on September 21, 2011.	Also see Question 62 Attachment Q62_092111_Willbridge.pdf